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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

10 SONOS, INC.,
11 Plaintiff,
12
13 vs.
14 GOOGLE LLC,
15 Defendant.

CASE NO. 3:21-cv-07559-WHA
Related to CASE NO. 3:20-cv-06754-WHA
**DECLARATION OF JOCELYN MA IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF ITS ANSWER TO SONOS,
INC.'S THIRD AMENDED COMPLAINT**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under
 7 Seal Portions of its Answer to Sonos, Inc.’s (“Sonos”) Third Amended Complaint (“Answer”). If
 8 called as a witness, I could and would testify competently to the information contained herein.

9 3. Google seeks an order sealing the materials as listed below:

10 Document	11 Portions to be Filed Under 12 Seal	13 Designating Party
14 Google’s Answer	15 Portions highlighted in green	16 Google
17 Exhibit 2 to Google’s Answer	18 Entire Document	19 Google
20 Exhibit 3 to Google’s Answer	21 Entire Document	22 Google
23 Exhibit 4 to Google’s Answer	24 Entire Document	25 Google

26 4. The portions of Google’s Answer highlighted in green contain confidential business
 27 information, including terms to a confidential agreement and details regarding Google’s business
 28 partnerships that are not public. Public disclosure of this information would harm Google’s
 competitive standing and its ability to negotiate future agreements by giving competitors access to
 Google’s highly confidential business thinking and asymmetrical information about Google’s
 collaboration strategies and partnerships with other entities. If such information were made public, I
 understand that Google’s competitive standing would be significantly harmed. I also understand that a
 less restrictive alternative than sealing the green-highlighted portions of Google’s Answer would not
 be sufficient because the information sought to be sealed is Google’s proprietary and confidential
 business information but is necessary to the affirmative defenses in Google’s Answer.

1 5. Exhibit 2 contains confidential business information and is comprised of a confidential
2 agreement that is not public. Public disclosure of this information would harm Google's competitive
3 standing and its ability to negotiate future agreements by giving competitors access to Google's highly
4 confidential business thinking and asymmetrical information about Google's collaboration strategies
5 to other entities. If such information were made public, I understand that Google's competitive
6 standing would be significantly harmed. I also understand that a less restrictive alternative than
7 sealing Exhibit 2 would not be sufficient because the information sought to be sealed is Google's
8 proprietary and confidential business information but is necessary to the affirmative defenses in
9 Google's Answer.

10 6. Exhibits 3 and 4 contain references to Google’s confidential business information and
11 trade secrets, including details regarding source code, architecture, and technical operation of
12 Google’s products and functionalities that Sonos accuses of infringement. The specifics of how these
13 functionalities operate is confidential information that Google does not share publicly. Thus, public
14 disclosure of such information could lead to competitive harm to Google as competitors could use
15 these details regarding the architecture and functionality of Google’s products to gain a competitive
16 advantage in the marketplace with respect to their competing products. I also understand that a less
17 restrictive alternative than sealing Exhibits 3 and 4 would not be sufficient because the information
18 sought to be sealed is Google’s confidential business information and trade secrets but is necessary to
19 the affirmative defenses in Google’s Answer.

20 I declare under penalty of perjury under the laws of the United States of America that to the
21 best of my knowledge the foregoing is true and correct. Executed on July 22, 2022, in San Francisco,
22 California.

23 | DATED: July 22, 2022

24 By: /s/ Jocelyn Ma
25 Jocelyn Ma

1 **ATTESTATION**

2 I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the
3 above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Jocelyn Ma has concurred
4 in the aforementioned filing.

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6 DATED: July 22, 2022

7 /s/ Charles K. Verhoeven
8 Charles K. Verhoeven

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